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Sent: Monday, July 09, 2012 2:56 PM
To: LIHP Transition Project (DHCS-MED)
Cc: Callori, Jalyne (DHCS-LIHP); Mak, Alice (DHCS-MED-PDB)
Subject: Comments on draft LIHP Transition Plan

Hello there,

I have the following comments to submit on behalf of CWDA regarding the draft LIHP Transition Plan sent out on Thursday, June 28.

Overall, the plan has a significantly greater level of detail regarding the Medi-Cal Managed Care Plan Assignment portion of the process (starting page 3), including assignment to plans, communication of plan assignment, continuity of care and transition assistance than the eligibility portions of the process. My comments are specific to the eligibility processes and communication of the change to beneficiaries.

The section titled "Plan for Eligibility Determination and Pre-Enrollment," (page 2) is relatively light on detail, raising some questions for us.

- What is the role of county human services departments in the eligibility transition process? We have assumed that the county human services departments will play a role in this function, however, the plan discusses only DHCS and "the State or Exchange." Given that we assume most of the LIHP enrollees will be eligible under the Medi-Cal expansion population as single, childless adults, we recommend inclusion of county human services reps in the discussion of details.
- What is the proposed time frame for collection of data that might be incomplete, and then use of that data to determine eligibility? We have discussed whether that will be done as part of annual redetermination processes that would be required anyway; is that the plan, or is it likely that there will be some other methodology (or multiple methodologies)?
- "DHCS will work with local LIHPs to establish a plan for the collection of required data elements..." We encourage inclusion of county human services reps in the discussion as well given potential involvement of county human services in this process.
- All LIHPs enrollees will be provided with various information notices: Who will send these notices and information to the enrollees, and on what time frame?
- "Communication of Eligibility for Medicaid and Exchange" – We recommend the inclusion of county human services in the development of the outreach and communication strategy given that there is likely to be overlap to existing caseloads within county human services, such as in the CalFresh program, and the messaging can be done at human services offices in addition to health department offices.

In the section on page 5, "Information Systems and County Collection of Data Elements," a number of counties are utilizing their SAWS systems for this program. However, this section does not mention utilization of the data in the SAWS systems. We recommend discussion with county human services reps to ensure that this is comprehensively inclusive of data elements collected in SAWS and the SAWS capacity to report those elements to the state.

In the Schedule of Implementation Activities section, page 7, the July – December 2013 time frame includes Exchange outreach to potentially eligible LIHP enrollees. Given that county human services departments will have capacity to determine eligibility for both MAGI-based Medi-Cal as well as the

Exchange subsidy coverage, it would seem that there is no need to break this into separate activities rather than providing a comprehensive eligibility determination for both.

Thank you and we look forward to assisting in fleshing out the eligibility related sections of the plan and ensuring a successful transition into Medi-Cal and the Exchange.

Cathy

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